

### **III. REMARKS**

Applicants have considered the Office Action with mailing date of August 8, 2007. Claims 1 to 26 are pending in this application. By this amendment, claims 1, 9 and 18 have been amended. Applicants are not conceding in this application that those claims are not patentable over the art cited by the Office. The present claim amendments are only for facilitating expeditious prosecution. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants respectfully reserve the right to pursue the full scope of the subject matter of these original claims and other claims in one or more subsequent patent application that claim(s) priority to the instant application.

In the Office Action, claims 1-6, 8-26 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Guo et. al. (US Pub. No. 2005/0120121), hereinafter “Guo”. Claim 7 is rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over “Guo” in view of Marks (US 6,876,977), hereinafter “Marks”. Claims 9-17 and claims 18-26 are rejected for the same reasons given for claims 1-8. Reconsideration in view of the following remarks is respectfully requested.

#### **A. REJECTION OF CLAIM 4 UNDER 35 U.S.C. §103(a)**

With regard to the 35 U.S.C. §103(a) rejection over Guo and/or Marks as a secondary reference, Applicants assert that the cited references, considered individually or in combination, do not to teach or suggest each and every feature of the claimed invention.

In addition to previously submitted arguments, Applicants submit that Guo does not teach or suggest, *inter alia*, “identifying a set of back-end systems based on a location setting within a profile corresponding to the requestor”. Currently amended claim 1. Support for this is found in

¶[0023] of the originally filed specification of the application. Guo at ¶[0036] discloses an authentication server 110, which after a user registers to create a user ID and password, allows access to “any affiliate server...without requiring any additional authentication...” However, Guo does not teach or suggest that the authentication server *identifies* a set of back-end systems. Specifically, Gou’s *access* to multiple servers with a single user ID and password does not teach or suggest identifying a set of back-end systems and subsequently selecting a back-end system from the identified set of back-end systems. Gou’s authentication server, at best, authenticates/verify the identity of a user before allowing access to affiliate servers. An authentication process does not identify a set of back-end systems, but verifies a user against an existing user profile. To this extent, there is no nexus between verifying a user and identifying a set of back-end systems. As such, a person of ordinary skill in the art will not look to Guo to achieve the claimed feature of short-listing a set of back-end systems by applying Gou’s authentication process. Without a likelihood of success, a person of ordinary skill will find not motivation to refer to Gou. Accordingly, the Office has not established a basis for *prima facie* obviousness.

Turning to the Office’s citation of ¶[0043] in Guo, Applicants respectfully submit that Guo does not teach or suggest, *inter alia*, “***selecting a back-end system*** from the set of back-end systems ***for processing the request***, wherein the back-end system is selected based on the first item, wherein the first item is associated with a particular type of items...” Currently amended claim 1. Support for this is found in ¶[0022] and ¶[0023] of the originally filed specification of the application. In contrast to the claimed feature, Guo at ¶[0043] discloses an “authentication system to ***look up the location of a ... service*** for a given user”. Assuming *arguendo* that Guo’s authentication system teaches the claimed feature of selecting a back-end system according to the Office’s rationale. However, Guo’s ability to find the location of a service for a user does not

assist in selecting a back-end system on the basis of the type of item requested. To this extent, Guo looking up an appropriate location for a selected service based on a user's domain has no bearing to the claimed selection of a back-end system based on a particular type of items. Since there is no nexus between Guo's locating of a service for a user and the claimed feature, a person of ordinary skill will not find the motivation to look to Guo for selecting a back-end system from a set of such systems based on a particular type of item requested by a user. Accordingly, the Office has not established a basis of *prima facie* obviousness.

According to the Office's rationale, Guo's redirecting client computer system to affiliate server where the user selected a different service includes the claimed feature of limiting a request for a second item by the requestor to an item. Page 3 of the current Office Action. However, Guo teaches the **redirecting** to an affiliate server when a different service is requested by a user. By "redirecting", a requestor's request for a second item is not limited to the particular type of items associated with the selected back-end system. On the contrary, the request is just redirected to an affiliate server. To this extent, Guo's redirecting of a clients computer system to an affiliate server does not limit the "...request for a second item by the requestor to the particular type of items associated with the selected back-end system". Currently amended claim 1. As such, a person of ordinary skill in the art applying Guo's redirecting will not limit the request as out in the claimed invention. Accordingly, Applicants respectfully request that the Office withdraw the rejection or provide references that teach this limitation.

With respect to the Office's arguments regarding dependent claims 2-8, claims 9-17 and 18-26, Applicants herein reiterate the foregoing arguments. In addition, Applicants submit that all the dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserve the

right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejections.

#### **IV. CONCLUSION**

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

Date: November 8, 2007

/Hunter E. Webb/  
Hunter E. Webb  
Reg. No.: 54,593

Hoffman, Warnick & D'Alessandro LLC  
75 State Street, 14<sup>th</sup> Floor  
Albany, New York 12207  
(518) 449-0044  
(518) 449-0047 (fax)  
HEW/TC